

**From:** [Stoddard, Jamey](#)  
**To:** [Corsentino, Mark A.](#)  
**Cc:** [Forbus, Timothy H.](#)  
**Subject:** RE: Information Request for PFOS/PFAS Indirect Discharge  
**Date:** Wednesday, October 23, 2019 10:24:00 AM  
**Attachments:** [image001.png](#)

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Mark:

Thank you for the conversation yesterday regarding new indirect wastestreams to the Asplund wastewater facility from one of your permitted pretreatment facilities, NRC.

My understanding from our conversation and other materials on hand is that AWWU has issued a Temporary Industrial Discharge Permit (TIDP 2019-006) to NRC for PFOS/PFOA-contaminated wastewater from “several sources, including Ted Stevens Airport”. As we discussed, I would like to respectfully request some additional information so we can fully understand the scope and magnitude of the issue and what implications, if any, this new waste stream may have on the 301(h) analysis and potential future ESA Section 7 consultation.

Re: reporting and Notification:

I believe you indicated that notification was provided to EPA in a pretreatment report. I checked with our pretreatment coordinator Michael Le and he indicated that we would only typically be notified of changes to the pretreatment program with the annual pretreatment report due February of each year as required by AWWU’s NPDES permit. I reviewed your annual pretreatment report dated Feb 14, 2019, and did note the language in the section “Year Ahead Plans” re: a decision to further evaluate discharges of PFOS/PFOA and that a Policy was being developed to align the acceptance of this type of wastewater with State and Federal guidelines, but didn’t see anything specific to an actual discharge or new permit for PFOS/PFOA-contaminated wastewater. Was that the notification you were referring to, or is there something specific to the recent TIDP to NRC that you can point me to?

I was unable to find notification from the NPDES permit side re: a new introduction of pollutants. Section IV.A.1 of your NDPEs permit states:

*A. Notice of New Introduction of Pollutants*

- 1. The permittee shall provide adequate notice to the Director, Office of Water, and ADEC of:*
  - a. Any new introduction of pollutants into the treatment works from an indirect discharger which would be subject to sections 301 or 306 of the Act if it were directly discharging those pollutants, and*
  - b. Any substantial change in the volume or character of pollutants being introduced into the treatment works by a source introducing pollutants into the treatment works at the time of issuance of the permit.*
- 2. For the purposes of this section, adequate notice shall include information on:*
  - a. The quality and quantity of effluent to be introduced into such treatment works, and*
  - b. Any anticipated impact of the change on the quantity or quality of effluent to be discharged from such publicly owned treatment works.*

Since there are no standards for PFOS/PFOA yet other than the human health lifetime advisory of 70 ng/L, A.1.b is the applicable provision here. Setting aside the determination of whether the new waste stream would be considered a “substantial” change in the volume or character of pollutants, I think given the sensitivities of the beluga issue and spotlight on 301(h) facilities it is always better to be on the prudent and cautious side and keep the lines of communication and notification open.

To that end, can you put together the notification information under A.2 above re: the quality and quantity of the new indirect discharge.

- Identification of all sources of PFOS/PFOA-contaminated waters being accepted/treated by NRC and discharged via Asplund. The TIDP 2019-006 language states “Several sources, including Ted Stevens International Airport.” We just need a clear and full accounting of all the sources. For instance, I have come to understand the State of Alaska has approved Fairbanks International Airport’s new plan to have NRC collect, treat, and dispose of fire control test pit water contaminated with PFOS/PFOA as well as hydrocarbons and arsenic at the NRC facility in Anchorage. Would this be covered under TIDP 2019-006?
- For each source identify the volume, characteristics, and frequency of the past and future discharge events (i.e., Ted Stevens: 200k gallon batch of wastewater contaminated with X,Y,Z discharged once a month for the next two years; Fairbanks Airport: 20k batch discharge contaminated with X,Y,Z, bi-weekly for next 10 months; JBER: 10k continuous daily discharge contaminated with X,Y,Z for next 6 months etc.).
- The efficacy of the NRC treatment process (analytical results of influent vs effluent concentrations of all pollutant parameters analyzed for each discharge event)
- Any current, past or future PFAS/PFOA samplings and analytical results at the Asplund wastewater treatment plant itself, including biosolids analysis (I believe you indicated the incineration process has been effective at eliminating PFOS/PFAS

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**From:** Corsentino, Mark A. <Mark.Corsentino@awwu.biz>  
**Sent:** Tuesday, October 22, 2019 8:38 AM  
**To:** Stoddard, Jamey <Stoddard.Jamey@epa.gov>  
**Cc:** Forbus, Timothy H. <Timothy.Forbus@awwu.biz>  
**Subject:** AWWU GM & Treatment Director email contacts

Jamey,  
You now have my email and my Treatment Director's email (Tim Forbus).  
Nice talking with you this morning, and look forward to future correspondence.



**Mark A. Corsentino, P.E.**  
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*AWWU is investing to ensure reliable service, safeguard public health, and protect the environment, long into the future.*